

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

CASE NO. 03-CR-10356-MLW

UNITED STATES

VS.

FREDERICK A. SIMONE,
a/k/a FREDDY, a/k/a
THE NEIGHBOR,

VINCENT C. GIOCCHINI,
a/k/a DEE DEE; and

FRANCIS WHITE, a/k/a
THE WHITE-HAIRED GUY

DEFENDANT'S MOTION
TO AMEND THE TERMS AND CONDITIONS OF BAIL

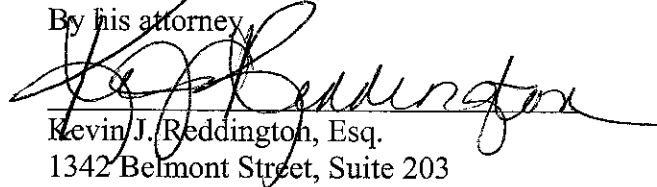
Now comes the defendant, Frederick A. Simone, in the above numbered cause and moves this Honorable Court for permission, while he is released on electronic monitoring, to amend the terms and conditions as follows;

- 1.) The defendant requests permission to visit with his physician whose office is located in Rhode Island. This physician has been his personal physician and maintains all of his records of treatment and medication and it is imperative that the defendant be able to consult with his physician as needed. Notice would be given to Pretrial Services and confirmation of the appointment would be submitted as well.
- 2.) The defendant requests permission to pick up Pamela Harris-Daley's child at his school after he gets out of school on no more than three occasions

per week. Said pick up would entail approximately 15 minutes to ½ hour to pick the child up and bring him back to the home where the defendant has been residing under electronic monitoring.

In all other respects the Order of the Court would remain in full force and effect.

Frederick A. Simone,
By his attorney,

A handwritten signature in black ink, appearing to read "Kevin J. Reddington", is written over a horizontal line.

Kevin J. Reddington, Esq.
1342 Belmont Street, Suite 203
Brockton, Massachusetts 02301
(508) 583-4280
BBO #414160

CERTIFICATE OF SERVICE

I, Kevin J. Reddington, Esq., Attorney for the Defendant, Frederick Simone, hereby certify that I have forwarded a copy of the within Motion to Amend Terms and Conditions of Bail, this date, via regular mail, to;

Ernest S. DiNisco
Colin G. Owyang
Assistant United States Attorneys
United States District Court
John Joseph Moakley U.S. Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02210


Kevin J. Reddington, Esq.

DATED: May 17, 2004